

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In Re:**

**BIG KAT DADDYS, LLC**

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§  
§

Case No. 21-30895

Chapter 11

**EMERGENCY MOTION TO CONTINUE CONFIRMATION HEARING**

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THIS MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN TWENTY-ONE (21) DAYS FROM THE DATE THAT THIS MOTION WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED; IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

**EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EXPEDITED CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.**

**To the Honorable Jeffrey P. Norman:**

Big Kat Daddys, LLC (“Big Kat”), hereby files this Emergency Motion for Continuance and in support of the requested relief, would show as follows:

**Basis for Emergency**

1. Big Kat filed its chapter 11 Subchapter V plan on June 9<sup>th</sup>, 2021.
2. On June 10<sup>th</sup>, 2021 the Court set a hearing date on July 22<sup>nd</sup>, 2021 for the confirmation of the Chapter 11 Subchapter V Plan.
3. The Debtor has been in talks with Counsel for Texas Comptroller of Public Accounts who also is representing the Texas Workforce commission who both need to amend their proofs of claim to show the accurate amounts and their classifications.
4. It appears that both the Texas Comptroller of Public Accounts and Texas Workforce

commission need more time to amend their proofs of claim.

5. There is only 10 days left till the Confirmation hearing set for July 22<sup>nd</sup>, 2021 and Debtor does not have time to file this motion with the standard 21 day noticing period, hence this emergency motion.

**Relief Requested**

6. The Debtor is waiting on the proof of claims for the Texas Comptroller of Public Accounts and the Texas Workforce Commission to be amended, then Debtor can amend the Chapter 11 Subchapter V plan to show proper numbers and classifications of the claims.
7. Debtor believes 30 days from the date of this motion is ample time to have an accurate confirmable plan on file.
8. Both the Texas Comptroller of Public Accounts and the Texas Workforce Commission do not oppose this motion.
9. Counsel for Debtor has not received any verbal or written objections from any other creditor or party in interest in regards to the current plan.

**WHEREFORE**, Big Kat requests that this Court enter an Order continuing the confirmation hearing on the Chapter 11 Subchapter V plan and extending all other deadlines that were imposed in the June 10<sup>th</sup>, 2021 Order, and for such other and further relief as the Court may deem just and proper.

Dated: July 12<sup>th</sup>, 2021

By: /s/ Nima Taherian  
Nima Taherian  
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Houston, TX 77024  
Tel 713-540-3830  
Fax 713-862-6405  
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**ATTORNEY FOR BIG KAT DADDYS,  
LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on this the July 12, 2021, a true and correct copy of the above notice was served upon the parties listed below via CM/ECF, via electronic mail or regular mail, as

indicated:

*Via ECF*

Office of The United States Trustee; 515 Rusk Ste 3516, Houston, TX 77002

*Via Regular Mail:*

ASCAP; PO Box 331608; Nashville, TN 37203;  
Burt Barr & Associates, L.L.P.; PO Box 223667; Dallas, TX 75222-3667  
Capital One Bank (USA), N.A.; by American InfoSource as agent; PO Box 71083;  
Charlotte, NC 28272-1083  
Cedar Spring Holdings, LLC; 314 Sawdust Rd. Ste 202; The Woodlands, TX 77380  
Cedar Springs Holdings, LLC; 335 Creek Pt; Alpharetta, GA 30004-7557  
Coleton Dempsey; c/o Keith M. Fletcher; 9821 Katy Freeway, Ste 925; Houston, TX 77024  
Funding Metrics, LLC; dba Lendini; 3220 Tillman Drive, Ste 200; Bensalem, PA 19020  
Gordon Food Services; PO Box 1787; Grand Rapids, MI 49501-1787  
Internal Revenue Service; P O Box 21126; Philadelphia PA 19114-1294  
Marlin Bank; 2795 E Cottonwood Pkwy; ste 120; Salt Lake City, UT 84121  
Montgomery County Tax Office; 400 N. San Jacinto; Conroe, TX 77301-2823  
Pawnee Leasing Corporation; 3801 Automation Way, Ste 207; Fort Collins, CO 80525  
Revel Systems, Inc; 575 Market St, Ste 2200; San Francisco, CA 94105  
Texas Comptroller of Public Accounts; c/o Office of the Attorney General;  
Bankruptcy- Collections Division MC-008; PO Box 12548; Austin, TX 78711-2548  
Texas Workforce Commission; Office of the Attorney General Bankruptcy & Collections Division; PO Box 12548, MC-008; Austin, TX 78711-2548

*Via email/ECF:*

Texas Comptroller of Public Accounts; c/o Texas Attorney General's Office;  
E. Stuart Phillips, Assistant Attorney General;  
[Stuart.Phillips@oag.texas.gov](mailto:Stuart.Phillips@oag.texas.gov)

Pawnee Leasing Corporation; c/o Alan R. Scheinthal;  
[ascheinthal@scheinthallawfirm.com](mailto:ascheinthal@scheinthallawfirm.com)

Jayce Thacker; [katdaddys101@gmail.com](mailto:katdaddys101@gmail.com)

/s/ Nima Taherian

Nima Taherian